



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

DEVAL L. PATRICK
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TIMOTHY P. MURRAY
Lieutenant Governor

RICHARD K. SULLIVAN JR.
Secretary

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Commissioner

Steve Morrow
Olin Corporation
3855 North Ocoee Street, Suite 200
Cleveland, TN 37312

MAR 03 2011

RE: WILMINGTON – Solid Waste/COR
Olin Gypsum Landfill
51 Eames Street
Modification of Post Closure Monitoring Plan
Approval
File # X236418
FMF # 131605

Dear Mr. Morrow:

The Massachusetts Department of Environmental Protection, Northeast Regional Office, Bureau of Waste Prevention, Solid Waste Management Section (MassDEP) has received your application for modification of the post closure monitoring plan for the Olin Calcium Sulfate Landfill, 51 Eames Street, Wilmington, Massachusetts (BWPSW45, Any Facility – Alternate Review, Transmittal Number X236418). The modification was prepared on your behalf by MACTEC Engineering and Consulting, Inc., Wakefield, Massachusetts ("MACTEC").

Pursuant to the approved Monitoring Plan, quarterly monitoring is to be discontinued. Commencing with 2011, ground water sampling will be conducted semi-annually (May and November). MassDEP concurs that the requirement for quarterly sampling to "re-establish a seasonal baseline data set" stipulated in the monitoring plan has been satisfied and sampling may proceed on a quarterly basis.

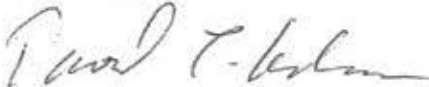
The collection of filtered samples will be discontinued. With the exception of Iron (Fe), Manganese (Mn) and Sodium (Na) all metals analyzed are below criteria limits. Iron, Manganese and Sodium show general consistency between filtered and unfiltered samples. Therefore, analysis of only unfiltered samples provides adequate data for monitoring ground water quality trends for the current time.

As specified by the Monitoring Plan, pursuant to 310 CMR 19.132(1)(f), sampling data from the collection and analysis of ground water, and other, samples will be submitted biennially with the results of physical observation of the landfill. MassDEP reminds you that Olin Corporation must comply with the requirements of 310 CMR 19.132 "Environmental Monitoring Requirements", including, but not limited to, 19.132(1)(f)1-4, 19.132(1)(g), 19.132(1)(i) and 19.132(1)(j). MassDEP observes the requirements of these sections are not clearly expressed in the Monitoring Plan. The Monitoring Plan, as included with your application, continues to include now superfluous provisions relative to the first year of data collection. To provide unambiguous direction to Olin Corporation's staff and contractors, MassDEP recommends that the Monitoring Plan be revised to clearly include the applicable requirements of 310 CMR 19.132, delete superfluous sections, and include:

1. a base map suitable in size and scale for presenting the analytical data, and estimating ground water contours and flow direction, and
2. a table including all monitoring points be developed which identifies point ID and type, point location by longitude/latitude and/or similar reference, monitoring point status (i.e. active, inactive, abandoned, etc.), special comments as necessary, and a brief description of the design (e.g. for monitoring wells: elevation of top of well, depth to bottom, depth to screen, screen interval, etc.).

If you have any questions regarding this matter, please contact David Adams at 978-694-3295.

Sincerely,



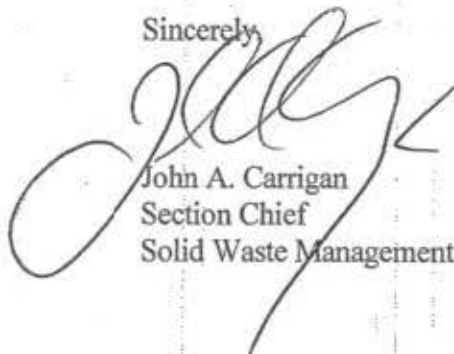
David C. Adams
Environmental Engineer
Solid Waste Management

JAC/DCA/dca

Cc:

Kerry Robert Tull
MACTEC Engineering and Consulting, Inc.
107 Audubon Road, Suite 301
Wakefield, Massachusetts 01880

Sincerely,



John A. Carrigan
Section Chief
Solid Waste Management